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May 17, 2019

**Via Electronic Filing**

Jocelyn G. Boyd

Chief Clerk/Administrator

**Public Service Commission of South Carolina**

Post Office Drawer 11649

Columbia, SC 29211

**Re: Beulah Solar, LLC – Request for Modification of an Interconnection  
Agreement with South Carolina Electric & Gas Company  
Docket Number 2018-401-E**

Dear Ms. Boyd:

Dominion Energy South Carolina ("DESC") (formerly South Carolina Electric & Gas) is providing this update pursuant to Order No. 2019-31-H in Docket 2018-401-E ("Hearing Officer Directive"), which requires the parties to provide an update regarding the resolution of discovery issues as well as an update regarding the status of the "stakeholder process" that began on March 7, 2019.

On March 5, 2019, DESC filed a Motion to Compel discovery responses from Beulah Solar, LLC ("Beulah"). On March 12, 2019, DESC filed similar a Motion to Compel as to Eastover Solar, LLC ("Eastover") (together with Beulah, the "Solar Developers"). On March 14, 2019, Beulah filed its response in opposition to the Motion to Compel. The Commission issued the Hearing Officer Directive on March 18, 2019, holding this matter in abeyance and requiring the above-referenced 60-day update. On April 11, 2019, counsel for Solar Developers wrote to the Hearing Officer advising that "[Solar Developers], upon reflection, do not see any basis for settlement of discovery issues" and that the previously scheduled in-person meeting with the Hearing Officer and SCE&G to resolve discovery issues "w[ould not] be worthwhile." As such, the meeting was cancelled. The discovery issues remain; there has been no progress or even – from what DESC can tell – no interest by Solar Developers in moving forward to address DESC's discovery requests.

Turning to the stakeholder process, there have been two such stakeholder meetings. A third meeting has not been scheduled. The stakeholder meetings do not relate to Solar Developers' objection to the curtailment language Solar Developers and DESC negotiated and agreed to in the now terminated interconnection agreements regarding the ability to curtail during defined reliability conditions. The language agreed to by DESC and Solar Developers outlines conditions which may lead to curtailment and were properly inserted into Appendix 5.

Appendix 5 is a Commission-approved blank form designed to be negotiated and completed by the two parties relating to the specific interconnection service provided. Contrary to the Solar Developers' "hope," no modifications to this language are being considered as a result of the stakeholder process.

Pursuant to Order No. 2018-804 in Docket 2017-370-E, DESC committed to a stakeholder process to, among other things, "[d]evelop a fair, reasonable, and nondiscriminatory protocol for the curtailment of all legally dispatchable generating resources in circumstances where curtailment of solar resources is necessary due to system conditions on [DESC]'s Transmission System or Distribution System, or otherwise required under the terms of those solar resources' interconnection agreements with [DESC]." Put simply, the purpose of the stakeholder process is to develop a protocol for implementation of curtailment once DESC determines that curtailment is necessary. DESC determines when curtailment is necessary and this decision is not within the scope of the stakeholder process. As such, and given that the language in Appendix 5 sets forth conditions which may lead to curtailment and does not speak to how the curtailment will be implemented, there is no reason to expect that any of the matters before the Commission in this docket will be impacted in any way by the stakeholder process.

DESC remains willing to meet with the Hearing Officer and Solar Developers to resolve the outstanding discovery matters. If you have any questions regarding the stakeholder process, please contact the undersigned.

Sincerely,

A handwritten signature in blue ink, appearing to read "J. Ashley Cooper", with a long horizontal flourish extending to the right.

J. Ashley Cooper

JAC:hmp

cc: (Via Electronic Mail and First Class Mail)  
Richard L. Whitt  
Jeremy C. Hodges  
Weston Adams III  
Jenny R. Pittman